

U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

February 12, 2008

By Hand

The Honorable Richard J. Sullivan
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street, Rm. 615
New York, New York 10007

Re: United States v. Clyde W. Hall and Anne Hall
07 Cr. 406 (RJS)

Dear Judge Sullivan:

By a memo-endorsed letter from defense counsel for Clyde Hall, the Court amended the pre-trial motion briefing schedule such that Hall's motions would be due on February 4, 2008, the Government's opposition on February 18, 2008, and Hall's reply on February 25, 2008. I have received the defendant's pre-trial motions. However, as the Assistant U.S. Attorney responsible for this case, I am also in the process of drafting and editing an appeal in United States v. Sergentakis, 07-0809-cr, a motion for remand in United States v. Gomez, 07-1857-cr, and a response to a habeas petition in United States v. Caro, 02 Civ. 5442 (JFK). Accordingly, I do not anticipate completing the Government's opposition to the defendants' pre-trial motions in this case by the current deadline, and request a two week adjournment of the relevant dates (*i.e.*, from February 18, 2008 to March 3, 2008 and from February 25, 2008 to March 10, 2008.) I have spoken to counsel for both defendants and they have consented to this request.

Your Honor has also excluded time under the Speedy Trial Clock until February 25, 2008. Given the forgoing extension request, the Government also respectfully requests that time be excluded until March 10, 2008.

Hon. Richard J. Sullivan
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Thank you for your consideration of this request.

Respectfully submitted,

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United States Attorney

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cc (by fax): James A. Cohen, Esq. (counsel for Clyde Hall)
Lee Ginsberg, Esq. (counsel for Anne Hall)


SO ORDERED _____
Dated: RICHARD J. SULLIVAN
U.S.D.J.